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3-10 CR 073-K

No.



V.

a.k.a. "Conejo,"

a.k.a. "Harry"

a.k.a. "Carlos Garcia-Jimenez"

a.k.a. "Costeno

a.k.a. "Condor"

a.k.a. "El Mono"

a.k.a. "Miguel Angel"

a.k.a. "Juan Pablo Leyba"

HIGUERA (08)

The Grand Jury Charges:

**Conspiracy to Import Five Kilograms
or More of Cocaine
(Violation of 21 U.S.C. § 963)**

Beginning in or about October 2006, the exact date being unknown to the Grand Jury, and continuing thereafter until on or about January 1, 2008, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Harold Mauricio Poveda-Ortega,**

a.k.a. "Conejo," Horley Rengifo-Pareja, a.k.a. "Harry," Jenny Vivian Hurtado-Beltran, Roberto Mario Angulo-Isaza, a.k.a. "Carlos Garcia-Jimenez" a.k.a. "Costeno," and FNU LNU, a.k.a. "Condor," did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons, known and unknown to the Grand Jury, to import into the United States, from a place outside thereof, five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 952(a) and 960(b)(1)(B).

All in violation of Title 21, United States Code, Section 963.

Count Two
Attempt To Import Five Kilograms
or More of Cocaine
(Violation of 21 U.S.C. § 963)

On or about October 16, 2007, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Harold Mauricio Poveda-Ortega, a.k.a. "Conejo," Horley Rengifo-Pareja, a.k.a. "Harry," Jenny Vivian Hurtado-Beltran, Roberto Mario Angulo-Isaza, a.k.a. "Carlos Garcia-Jimenez" a.k.a. "Costeno," and FNU LNU, a.k.a. "Condor,"** did knowingly and intentionally attempt to import into the United States, from a place outside thereof, five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 952(a) and 960(b)(1)(B).

All in violation of Title 21, United States Code, Section 963 and Title 18, United States Code, Section 2.

Count Three
Conspiracy to Launder Monetary Instruments
(Violation of 18 U.S.C. § 1956(h))

1. Beginning in or about October 2006, the exact date being unknown to the Grand Jury, and continuing thereafter until on or about December 1, 2007, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Horley Rengifo-Pareja, a.k.a. "Harry," Jenny Vivian Hurtado-Beltran, FNU LNU, a.k.a. "El Mono," Tito Miller Parra-Isaza, a.k.a. "Miguel Angel" a.k.a. "Juan Pablo Leyba," and Joaquin Alejandro Senderos-Higuera**, did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons, known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and 1957, namely,

(a) to conduct financial transactions affecting interstate or foreign commerce, which transactions involved the proceeds of specified unlawful activity, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting such transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

(b) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and

knowing that such transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); and

(c) to engage and attempt to engage in monetary transactions by, through and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity referred to above is: (1) the felonious manufacture, importation, receiving, concealment, buying, selling and otherwise dealing in a controlled substance; and (2) an offense against a foreign nation involving the manufacture, importation, sale and distribution of a controlled substance.

Means and Methods of the Conspiracy

2. It was a part of the conspiracy that, defendant **Jenny Vivian Hurtado-Beltran** would travel to the United States, including Dallas, Texas, and other locations, to discuss the receipt and laundering of proceeds of trafficking in controlled substances through various methods, and relay such information to defendant **Horley Rengifo-Pareja, a.k.a. "Harry."**

3. It was further part of the conspiracy that defendants **Horley Rengifo-Pareja, a.k.a. "Harry," FNU LNU a.k.a. "El Mono," Tito Miller Parra-Izasa a.k.a. "Miguel Angel" a.k.a. "Juan Pablo Leyba," and Joaquin Alejandro Senderos-Higuera,** and other conspirators, utilized various methods to launder the proceeds of trafficking in controlled substances including, but not limited to, wire transferring proceeds of trafficking in controlled

substances from exchange houses in Mexico to financial institutions located in the United States.

4. It was further part of the conspiracy that defendants **Horley Rengifo-Pareja, a.k.a. "Harry," FNU LNU a.k.a. "El Mono," Tito Miller Parra-Izasa a.k.a. "Miguel Angel" a.k.a. "Juan Pablo Leyba," and Joaquin Alejandro Senderos-Higuera,** and other conspirators, would have the proceeds of trafficking in controlled substances withdrawn from financial institutions located in the United States, including Dallas, Texas, in large amounts of United States currency ("bulk cash") and have the bulk cash transported, transmitted, and transferred outside the United States to other locations including Panama City, Panama.

5. It was further part of the conspiracy that defendants utilized communication facilities including telephones and cellular telephones and various email methods including save drafts and instant messenger, to discuss, negotiate and facilitate the laundering of proceeds of trafficking in controlled substances.

6. It was further part of the conspiracy that defendants used coded language and other means to misrepresent, conceal and hide, and to cause to be misrepresented, concealed and hidden, the money laundering activities of the conspiracy, and to avoid detection and apprehension by law enforcement authorities.

All in violation of Title 18, United States Code, Section 1956(h).

Counts Four - Sixteen
Money Laundering
(Violation of 18 U.S.C. § 1956(a)(1)(B)(i))

On or about the dates specified and in the approximate amounts identified as to each count below, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Horley Rengifo-Pareja, a.k.a. "Harry," FNU LNU, a.k.a. "El Mono," Tito Miller Parra-Isaza, a.k.a. "Miguel Angel" a.k.a. "Juan Pablo Leyba," and Joaquin Alejandro Senderos-Higuera**, did knowingly conduct and attempt to conduct financial transactions, as set forth below, affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, (1) the felonious manufacture, importation, receiving, concealment, buying, selling and otherwise dealing in a controlled substance and (2) an offense against a foreign nation involving the manufacture, importation, sale and distribution of a controlled substance, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

Count	Date	Type of Transaction
Four	July 5, 2007	Wire transfer in the amount of \$24,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Five	July 5, 2007	Wire transfer in the amount of \$36,000 from an exchange house in Mexico to account #

		xxxxxxxxx507 at Bank of America in Dallas, Texas
Six	July 5, 2007	Wire transfer in the amount of \$80,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Seven	July 9, 2007	Wire transfer in the amount of \$89,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Eight	July 9, 2007	Wire transfer in the amount of \$90,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Nine	July 9, 2007	Wire transfer in the amount of \$95,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Ten	July 9, 2007	Wire transfer in the amount of \$99,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Eleven	July 9, 2007	Wire transfer in the amount of \$100,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Twelve	July 9, 2007	Wire transfer in the amount of \$100,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Thirteen	July 12, 2007	Wire transfer in the amount of \$100,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Fourteen	July 13, 2007	Wire transfer in the amount of \$90,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas,

		Texas
Fifteen	July 13, 2007	Wire transfer in the amount of \$97,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Sixteen	July 13, 2007	Wire transfer in the amount of \$100,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Counts Seventeen - Twenty-NineMoney Laundering
(Violation of 18 U.S.C. § 1957)

On or about the dates specified and in the approximate amounts identified as to each count below, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Horley Rengifo-Pareja, a.k.a. "Harry," FNU LNU, a.k.a. "El Mono," Tito Miller Parra-Isaza, a.k.a. "Miguel Angel" a.k.a. "Juan Pablo Leyba," and Joaquin Alejandro Senderos-Higuera**, did knowingly engage and attempt to engage in monetary transactions, as set forth below, by through and to a financial institution, affecting interstate and foreign commerce, in criminal derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, (1) the felonious manufacture, importation, receiving, concealment, buying, selling and otherwise dealing in a controlled substance and (2) an offense against a foreign nation involving the manufacture, importation, sale and distribution of a controlled substance.

Count	Date	Type of Transaction
Seventeen	July 5, 2007	Wire transfer in the amount of \$24,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Eighteen	July 5, 2007	Wire transfer in the amount of \$36,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas
Nineteen	July 5, 2007	Wire transfer in the amount of \$80,000 from an exchange house in Mexico to account # xxxxxxxxx507 at Bank of America in Dallas, Texas

Twenty	July 9, 2007	Wire transfer in the amount of \$89,000 from an exchange house in Mexico to account # xxxxxxxxxx507 at Bank of America in Dallas, Texas
Twenty-One	July 9, 2007	Wire transfer in the amount of \$90,000 from an exchange house in Mexico to account # xxxxxxxxxx507 at Bank of America in Dallas, Texas
Twenty-Two	July 9, 2007	Wire transfer in the amount of \$95,000 from an exchange house in Mexico to account # xxxxxxxxxx507 at Bank of America in Dallas, Texas
Twenty-Three	July 9, 2007	Wire transfer in the amount of \$99,000 from an exchange house in Mexico to account # xxxxxxxxxx507 at Bank of America in Dallas, Texas
Twenty-Four	July 9, 2007	Wire transfer in the amount of \$100,000 from an exchange house in Mexico to account # xxxxxxxxxx507 at Bank of America in Dallas, Texas
Twenty-Five	July 9, 2007	Wire transfer in the amount of \$100,000 from an exchange house in Mexico to account # xxxxxxxxxx507 at Bank of America in Dallas, Texas
Twenty-Six	July 12, 2007	Wire transfer in the amount of \$100,000 from an exchange house in Mexico to account # xxxxxxxxxx507 at Bank of America in Dallas, Texas
Twenty-Seven	July 13, 2007	Wire transfer in the amount of \$90,000 from an exchange house in Mexico to account # xxxxxxxxxx507 at Bank of America in Dallas, Texas
Twenty-Eight	July 13, 2007	Wire transfer in the amount of \$97,000 from an exchange house in Mexico to account # xxxxxxxxxx507 at Bank of America in Dallas, Texas
Twenty-Nine	July 13, 2007	Wire transfer in the amount of \$100,000

		from an exchange house in Mexico to account # xxxxxxxxxx507 at Bank of America in Dallas, Texas
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In violation of Title 18, United States Code, Section 1957, Title 18, United States Code,
Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Thirty
Money Laundering
(Violation of 18 U.S.C. § 1956(a)(2)(B)(i))

On or about July 19, 2007, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Horley Rengifo-Pareja, a.k.a. "Harry," FNU LNU, a.k.a. "El Mono," Tito Miller Parra-Isaza, a.k.a. "Miguel Angel" a.k.a. "Juan Pablo Leyba," and Joaquin Alejandro Senderos-Higuera** did knowingly transport, transmit, and transfer, and attempt to transport, transmit, and transfer approximately \$1,000,000, from Dallas, Texas, a place in the United States, to Panama City, Panama, a place outside the United States, knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, that is, (1) the felonious manufacture, importation, receiving, concealment, buying, selling and otherwise dealing in a controlled substance, and (2) an offense against a foreign nation involving the manufacture, importation, sale and distribution of a controlled substance.

In violation of Title 18, United States Code, Section 1956(a)(2)(B)(i), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Thirty-One
Money Laundering
(Violation of 18 U.S.C. § 1956 (a)(2)(B)(i))

On or about July 23, 2007, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendant, **Horley Rengifo-Pareja, a.k.a. "Harry,"** did knowingly transport, transmit, and transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, namely approximately \$499,250, from Mexico City, Mexico, a place outside the United States, to Dallas, Texas, a place inside the United States, knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, that is, (1) the felonious manufacture, importation, receiving, concealment, buying, selling and otherwise dealing in a controlled substance, and (2) an offense against a foreign nation involving the manufacture, importation, sale and distribution of a controlled substance.

In violation of Title 18, United States Code, Section 1956(a)(2)(B)(i), and Title 18, United States Code, Section 2.

Count Thirty-Two
Conspiracy to Launder Monetary Instruments
(Violation of 18 U.S.C. § 1956(h))

1. Beginning in or about October 2006, the exact date being unknown to the Grand Jury, and continuing thereafter until on or about February 15, 2008, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Horley Rengifo-Pareja, a.k.a "Harry," Jenny Vivian Hurtado-Beltran, Roberto Mario Angulo-Isaza, a.k.a "Carlos Garcia-Jimenez" a.k.a. "Costeno," and FNU LNU, a.k.a. "Condor,"** did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons, known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and 1957, namely,

(a) to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting such transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

(b) to transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, knowing that the funds involved in the transportation, transmission, and transfer represented the proceeds of some form of unlawful activity and knowing that such

transportation, transmission, and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(2)(B)(i); and

(c) to engage and attempt to engage in monetary transactions by, through and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, in violation of Title 18, United States Code, Section 1957.

It is further alleged that the specified unlawful activity referred to above is: (1) the felonious manufacture, importation, receiving, concealment, buying, selling and otherwise dealing in a controlled substance; and (2) an offense against a foreign nation involving the manufacture, importation, sale and distribution of a controlled substance.

Means and Methods of the Conspiracy

2. It was part of the conspiracy that defendant **Jenny Vivian Hurtado-Beltran** would travel to the United States, including Dallas, Texas, and other locations, to discuss the receipt and laundering of proceeds of trafficking in controlled substances through various methods, and relay such information to **Horley Rengifo-Pareja, a.k.a. "Harry."**

3. It was further part of the conspiracy that defendants **Horley Rengifo-Pareja, a.k.a. "Harry," Roberto Mario Angulo-Isaza, a.k.a. "Carlos Garcia-Jimenez" a.k.a. "Costeno," and FNU LNU, a.k.a "Condor,"** utilized various methods to launder the proceeds of drug trafficking including, but not limited to, using a trade based method to convert U.S. drug dollars in the U.S. to Colombian pesos in Colombia.

4. It was further part of the conspiracy that defendant **Horley Rengifo-Pareja, a.k.a. "Harry,"** would use automobiles with hidden compartments to conceal bulk cash and would coordinate the delivery and receipt of the concealed bulk cash in Mexico. The bulk cash would then be transported to the United States and deposited into financial institutions located in the United States, including Dallas, Texas.

5. It was further part of the conspiracy that, after the bulk cash was deposited into financial institutions in the United States, defendants **Roberto Mario Angulo-Isaza, a.k.a. "Carlos Garcia-Jimenez" a.k.a. "Costeno," FNU LNU, a.k.a "Condor,"** and other conspirators, would provide instructions, via various communication facilities including, but not limited to, telephones and cellular telephones and various email methods including saved drafts and instant messenger, to wire transfer the proceeds of the drug trafficking activities to various entities located in the United States and outside the United States.

6. It was further part of the conspiracy that defendants used coded language and other means to misrepresent, conceal and hide, and to cause to be misrepresented, concealed and hidden, the money laundering activities of the conspiracy, and to avoid detection and apprehension by law enforcement authorities.

All in violation of Title 18, United States Code, Section 1956(h).

Count Thirty-Three
Money Laundering
(Violation of 18 U.S.C. § 1956 (a)(2)(B)(i))

On or about August 27, 2007, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendant, **Horley Rengifo-Pareja, a.k.a. "Harry,"** did knowingly transport, transmit, transfer, and attempt to transport, transmit, and transfer monetary instruments and funds, that is approximately \$1,049,950, from Mexico City, Mexico, a place outside the United States, to Dallas, Texas, a place inside the United States, knowing that the monetary instruments and funds involved in the transportation, transmission and transfer represented the proceeds of some form of unlawful activity and knowing that such transportation, transmission and transfer was designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of specified unlawful activity, that is, (1) the felonious manufacture, importation, receiving, concealment, buying, selling and otherwise dealing in a controlled substance, and (2) an offense against a foreign nation involving the manufacture, importation, sale and distribution of a controlled substance.

In violation of Title 18, United States Code, Section 1956 (a)(2)(B)(i), and Title 18, United States Code, Section 2.

Counts Thirty-Four - Fifty-Nine
 Money Laundering
 (Violation of 18 U.S.C. § 1956(a)(1)(B)(i))

On or about the dates specified and in the approximate amounts identified as to each count below, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Horley Rengifo-Pareja, a.k.a. "Harry," Roberto Mario Angulo-Isaza, a.k.a. "Carlos Garcia-Jimenez" a.k.a. "Costeno," and FNU LNU, a.k.a "Condor,"** did knowingly conduct and attempt to conduct financial transactions, as set forth below, affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, (1) the felonious manufacture, importation, receiving, concealment, buying, selling and otherwise dealing in a controlled substance and (2) an offense against a foreign nation involving the manufacture, importation, sale and distribution of a controlled substance, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

Count	Date	Type of Transaction
Thirty-Four	September 5, 2007	Wire transfer in the amount of \$50,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx883 at Hang Seng Bank Ltd
Thirty-Five	September 7, 2007	Wire transfer in the amount of \$37,868 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxxxxxxx942 at Bank of China
Thirty-Six	September 7, 2007	Wire transfer in the amount of \$22,132

		from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxxxxxx942 at Bank of China in China
Thirty-Seven	September 7, 2007	Wire transfer in the amount of \$79,000 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxx506 at Bank of America
Thirty-Eight	September 7, 2007	Wire transfer in the amount of \$15,035 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxx677 at Bank of America
Thirty-Nine	September 7, 2007	Wire transfer in the amount of \$18,100 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxx677 at Bank of America
Forty	September 7, 2007	Wire transfer in the amount of \$20,000 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxx259 at Bank of America
Forty-One	September 7, 2007	Wire transfer in the amount of \$12,010 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to xxxxxxxxx598 at Bank of America
Forty-Two	September 7, 2007	Wire transfer in the amount of \$10,018 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxx110 at Colonial Bank
Forty-Three	September 7, 2007	Wire transfer in the amount of \$16,000 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxx787 at Bank of America
Forty-Four	September 7, 2007	Wire transfer in the amount of \$5,000 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxx106 at Total Bank
Forty-Five	September 7, 2007	Wire transfer in the amount of \$100,000

		from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxx655 at Regions Bank
Forty-Six	September 7, 2007	Wire transfer in the amount of \$12,025 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxx677 at Bank of America
Forty-Seven	September 10, 2007	Wire transfer in the amount of \$40,000 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxxxx818 at TD Canada Trust Bank
Forty-Eight	September 10, 2007	Wire transfer in the amount of \$200,000 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxx534 at Xiamen International Bank
Forty-Nine	September 10, 2007	Wire transfer in the amount of \$20,000 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxx688 at Bank of America
Fifty	September 11, 2007	Wire transfer in the amount of \$20,000 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxx767 at Wachovia Bank
Fifty-One	September 11, 2007	Wire transfer in the amount of \$15,000 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxx803 at Wachovia Bank
Fifty-Two	September 12, 2007	Wire transfer in the amount of \$80,000 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxx833 at HSBC - Hong Kong
Fifty-Three	September 20, 2007	Wire transfer in the amount of \$45,714.28 from account # xxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxx487 at Bank of America

Fifty-Four	September 28, 2007	Wire transfer in the amount of \$4,680 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx146 at Bank of America
Fifty-Five	September 28, 2007	Wire transfer in the amount of \$40,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx487 at Bank of America
Fifty-Six	September 28, 2007	Wire transfer in the amount of \$76,049.14 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx487 at Bank of America
Fifty-Seven	September 28, 2007	Wire transfer in the amount of \$49,618.58 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx487 at Bank of America
Fifty-Eight	October 2, 2007	Wire transfer in the amount of \$30,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx605 at Ocean Bank
Fifty-Nine	October 17, 2007	Wire transfer in the amount of \$20,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxx346 at Bank of America

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Counts Sixty - Eighty-Three
 Money Laundering
 (Violation of 18 U.S.C. § 1957)

On or about the dates specified and in the approximate amounts identified as to each count below, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendants, **Horley Rengifo-Pareja, a.k.a. "Harry," Roberto Mario Angulo-Isaza, a.k.a. "Carlos Garcia-Jimenez" a.k.a. "Costeno," and FNU LNU, a.k.a. "Condor,"** did knowingly engage and attempt to engage in a monetary transactions, as set forth below, by through and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, (1) the felonious manufacture, importation, receiving, concealment, buying, selling and otherwise dealing in a controlled substance and (2) an offense against a foreign nation involving the manufacture, importation, sale and distribution of a controlled substance.

Count	Date	Type of Transaction
Sixty	September 5, 2007	Wire transfer in the amount of \$50,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx883 at Hang Seng Bank Ltd
Sixty-One	September 7, 2007	Wire transfer in the amount of \$37,868 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxxxxxxx942 at Bank of China
Sixty-Two	September 7, 2007	Wire transfer in the amount of \$22,132 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxxxxxxx942 at Bank of China
Sixty-Three	September 7, 2007	Wire transfer in the amount of \$79,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account #

		xxxxxxxxx506 at Bank of America
Sixty-Four	September 7, 2007	Wire transfer in the amount of \$15,035 from account # xxxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxx677 at Bank of America
Sixty-Five	September 7, 2007	Wire transfer in the amount of \$18,100 from account # xxxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxx677 at Bank of America
Sixty-Six	September 7, 2007	Wire transfer in the amount of \$20,000 from account # xxxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxx259 at Bank of America
Sixty-Seven	September 7, 2007	Wire transfer in the amount of \$12,010 from account # xxxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxx598 at Bank of America
Sixty-Eight	September 7, 2007	Wire transfer in the amount of \$10,018 from account # xxxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxx110 at Colonial Bank
Sixty-Nine	September 7, 2007	Wire transfer in the amount of \$16,000 from account # xxxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxx787 at Bank of America
Seventy	September 7, 2007	Wire transfer in the amount of \$100,000 from account # xxxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxx655 at Regions Bank
Seventy-One	September 7, 2007	Wire transfer in the amount of \$12,025 from account # xxxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxx677 at Bank of America
Seventy-Two	September 10, 2007	Wire transfer in the amount of \$40,000 from account # xxxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxxxxxx818 at TD Canada Trust

		Bank
Seventy-Three	September 10, 2007	Wire transfer in the amount of \$200,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx534 at Xiamen International Bank
Seventy-Four	September 10, 2007	Wire transfer in the amount of \$20,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxx688 at Bank of America
Seventy-Five	September 11, 2007	Wire transfer in the amount of \$20,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx767 at Wachovia Bank
Seventy-Six	September 11, 2007	Wire transfer in the amount of \$15,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx803 at Wachovia Bank
Seventy-Seven	September 12, 2007	Wire transfer in the amount of \$80,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx833 at HSBC - Hong Kong
Seventy-Eight	September 20, 2007	Wire transfer in the amount of \$45,714.28 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx487 at Bank of America
Seventy-Nine	September 28, 2007	Wire transfer in the amount of \$40,000 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx487 at Bank of America
Eighty	September 28, 2007	Wire transfer in the amount of \$76,049.14 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxx487 at Bank of America
Eighty-One	September 28, 2007	Wire transfer in the amount of \$49,618.58 from account # xxxxxxxxxx536 at Bank of America in Dallas, Texas to account #

		xxxxxxxxxx487 at Bank of America
Eighty-Two	October 2, 2007	Wire transfer in the amount of \$30,000 from account # xxxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxxxxx605 at Ocean Bank
Eighty-Three	October 17, 2007	Wire transfer in the amount of \$20,000 from account # xxxxxxxxxxx536 at Bank of America in Dallas, Texas to account # xxxxxxxx346 at Bank of America

In violation of Title 18, United States Code, Section 1957, Title 18, United States Code, Section 2 and *Pinkerton v. United States*, 328 U.S. 640 (1946).

FORFEITURE ALLEGATION

1. The allegations in Counts One through Eighty-Three of this Indictment are realleged and incorporated by reference as if fully restated herein for the purpose of alleging that certain property is subject to forfeiture pursuant to the provisions of Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982.

2. Pursuant to Title 21, United States Code, Section 853(a)(1) and (2), each defendant who is convicted of Count One or Two shall forfeit: (1) any and all property constituting or derived from any proceeds they obtained, directly or indirectly, as a result of the violations, and (2) any and all property used, or intended to be used, in any manner or part, to commit or facilitate the commission of the violations. If more than one defendant is convicted of Count One or Two, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c).

4. Pursuant to Title 18, United States Code, Section 982(a)(1), each defendant who is convicted of one or more offenses set forth in Counts Three through Eighty-Three shall forfeit to the United of America the following property:

- a. All right, title, and interest in any and all property involved in each offense in violation of Title 18, United States Code, Section 1956 or 1957, for which the defendant is convicted, and all property traceable to such property, including the following: 1) all money or other property that was the subject of each transaction in violation of Section 1956 or 1957; 2) all commissions, fees and other property constituting proceeds obtained as a result of those violations; and 3) all property used in any manner or part to commit or to facilitate the commission of the violations in Counts Three through Eighty-Three, including but not limited to at least \$2,600,000.
- b. A sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted.
- c. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

5. If any of the property described above, as a result of any act or omission of the

defendants:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:


FOREPERSON

RICHARD WEBER, CHIEF
ASSET FORFEITURE AND MONEY LAUNDERING SECTION
CRIMINAL DIVISION
U.S. DEPARTMENT OF JUSTICE


SCOTT PACCAGNINI

Trial Attorney
United States Department of Justice
Asset Forfeiture and Money Laundering Section

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

MAR 24 2010

CLERK, U.S. DISTRICT COURT

By [Signature] Deputy

4:15 pm

UNITED STATES OF AMERICA

v. **8-10CR 073-K**

Harold Mauricio Poveda-Ortega, a.k.a. "Conejo",
Horley Rengifo-Pareja, a.k.a. "Harry"
Jenny Vivian Hurtado-Beltran,
Tito Miller Parra-Isaza, a.k.a. "Miguel Angel,"
a.k.a. "Juan Pablo Leyba",
Roberto Mario Angulo-Isaza, a.k.a. "Carlos Garcia-Jimenez,"
a.k.a. "Costeno"
FNU LNU, a.k.a "El Mono"
FNU LNU, a.k.a. "Condor"
Joaquin Alejandro Senderos-Higuera

SEALED INDICTMENT

21 U.S.C. § 963
Conspiracy to Import Five Kilograms or More of Cocaine

21 U.S.C. § 963
Attempt to Import Five Kilograms or More of Cocaine

18 U.S.C. §1956(h)
Conspiracy to Launder Monetary Instruments

18 U.S.C. § 1956 (a)(1)(B)(i)
Money Laundering

18 U.S.C. § 1957
Money Laundering

18 U.S.C. § 1956(h)
Conspiracy to Launder Monetary Instruments

18 U.S.C. § 1956 (a)(2)(B)(i)
Money Laundering

83 Counts

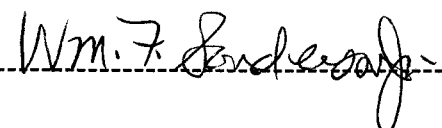
A true bill rendered

DALLAS


FOREPERSON

Filed in open court this 24th day of March, A.D. 2010.

Warrants to be Issued



UNITED STATES DISTRICT/MAGISTRATE JUDGE

No Magistrate/Criminal Complaint Pending

SEALED

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

Related Case Information

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____

Search Warrant Case Number _____

R 20 from District of _____

Magistrate Case Number _____

Defendant Name

HAROLD MAURICIO POVEDA-ORTEGA

Alias Name

"CONEJO"

Address

County in which offense was committed: _____

2. U.S. Attorney Information

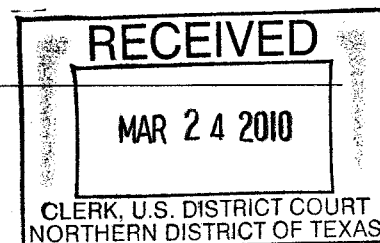
AUSA RICK A CALVERT

Bar # **TX Bar No. 03669700**

3. Interpreter

☒ Yes ☐ No

If Yes, list language and/or dialect: **SPANISH**



4. Location Status WARRANT TO BE ISSUED

Arrest Date: Issue arrest warrant

☐ Already in Federal Custody as of _____ in _____

☐ Already in State Custody

☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant:

☐ Petty

☐ Misdemeanor

☒ Felony

Citation

Description of Offense Charged

Count(s)

21 U.S.C. § 963

Conspiracy to Import Five Kilograms or More of Cocaine

1, 2

March 19, 2010

Signature of AUSA: _____

RICK A. CALVERT

SEALED 3-10-CR-073-K

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

Related Case Information

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number:

Search Warrant Case Number _____

R 20 from District of _____

Magistrate Case Number: _____

Defendant Name

HORLEY RENGIFO-PAREJA (1)

Alias Name

a/k/a "Harry"

Address

County in which offense was committed:

Dallas

2. U.S. Attorney Information

Rick A. Calvert

Bar # TX #03669700

3. Interpreter

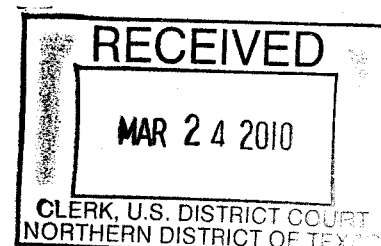
☒ Yes ☐ No

If Yes, list language and/or dialect: Spanish

4. Location Status

*** PLEASE ISSUE ARREST WARRANT***

- ☐ Already in Federal Custody
☐ Already in State Custody
☐ On Pretrial Release



5. U.S.C. Citations

Total # of Counts as to This Defendant: 83

☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
21 U.S.C. § 963	Conspiracy to Import Five Kilograms or More of Cocaine	1
21 U.S.C. § 963	Attempt to Import Five Kilograms or More of Cocaine	2
18 U.S.C. § 1956(h)	Conspiracy to Launder Monetary Instruments	3, 31
18 U.S.C. § 1956(a)(1) (B)(i)	Money Laundering	4-16, 34-59
18 U.S.C. § 1956(a)(2) (B)(i)	Money Laundering	17, 31, 32, 33

18 U.S.C. § 1957

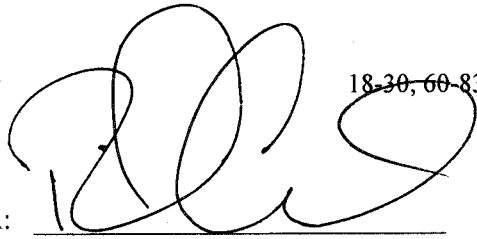
Money Laundering

18-30, 60-83

Date

3/19/10

Signature of AUSA:



UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS

Related Case Information

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number:

Search Warrant Case Number _____

R 20 from District of _____

Magistrate Case Number: _____

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Defendant Name

JENNY VIVIAN HURTADO-BELTRAN (3)

Alias Name

Address

County in which offense was committed:

Dallas

2. U.S. Attorney Information

Rick A. Calvert

Bar # TX #03669700

3. Interpreter

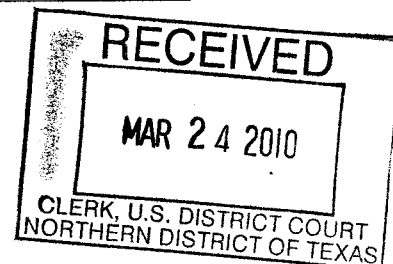
☒ Yes ☐ No

If Yes, list language and/or dialect: Spanish

4. Location Status

* PLEASE ISSUE ARREST WARRANT*

- ☐ Already in Federal Custody
☐ Already in State Custody
☐ On Pretrial Release



5. U.S.C. Citations

Total # of Counts as to This Defendant: 4

☐ Petty

☐ Misdemeanor

☒ Felony

Citation

Description of Offense Charged

Count(s)

21 U.S.C. § 963

Conspiracy to Import Five Kilograms or More of Cocaine

1

21 U.S.C. § 963

Attempt to Import Five Kilograms or More of Cocaine

2

18 U.S.C. § 1956(h)

Conspiracy to Launder Monetary Instruments

3, 31

Date

3/19/10

Signature of AUSA:

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS

Related Case Information

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No
 Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____
 Search Warrant Case Number _____
 R 20 from District of _____
 Magistrate Case Number: _____

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Defendant Name

ROBERTO MARIO ANGULO-ISAZA (4)

Alias Name

aka "Carlos Garcia-Jimenez", aka Costeno

Address

County in which offense was committed:

Dallas

2. U.S. Attorney Information

Rick A. Calvert

Bar # TX #03669700

3. Interpreter

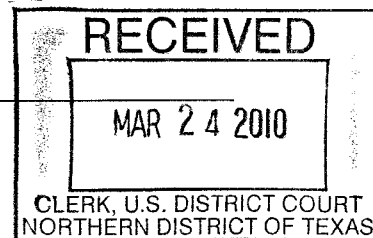
☒ Yes ☐ No

If Yes, list language and/or dialect: Spanish

4. Location Status

*** PLEASE ISSUE ARREST WARRANT***

- ☐ Already in Federal Custody
☐ Already in State Custody
☐ On Pretrial Release



5. U.S.C. Citations

Total # of Counts as to This Defendant:

53

☐ Petty

☐ Misdemeanor

☒ Felony

Citation

Description of Offense Charged

Count(s)

21 U.S.C. § 963

Conspiracy to Import Five Kilograms or More of Cocaine

1

21 U.S.C. § 963

Attempt to Import Five Kilograms or More of Cocaine

2

18 U.S.C. § 1956(h)

Conspiracy to Launder Monetary Instruments

31,32

18 U.S.C. § 1956(a)(1)
(B)(i)

Money Laundering

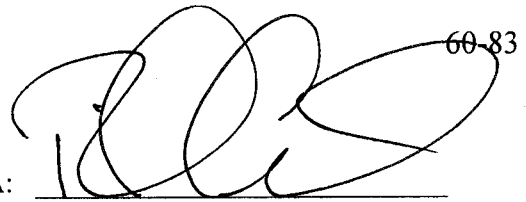
34-59

18 U.S.C. § 1957

Money Laundering

Date 3/23/10

Signature of AUSA:

 60-83

SEALED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Related Case Information

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number:

Search Warrant Case Number _____

R 20 from District of _____

Magistrate Case Number: _____

Defendant Name FNU LNU (5)

Alias Name aka "Condor"

Address _____

County in which offense was committed: Dallas

2. U.S. Attorney Information

Rick A. Calvert

Bar # TX #03669700

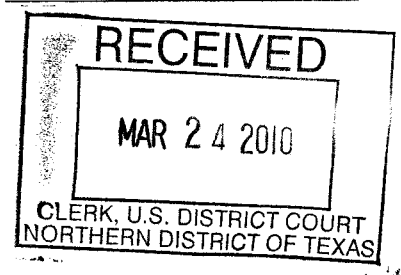
3. Interpreter

☒ Yes ☐ No If Yes, list language and/or dialect: Spanish

4. Location Status

* PLEASE ISSUE ARREST WARRANT*

☐ Already in Federal Custody
☐ Already in State Custody
☐ On Pretrial Release



5. U.S.C. Citations

Total # of Counts as to This Defendant: 53 ☐ Petty ☐ Misdemeanor ☒ Felony

Citation	Description of Offense Charged	Count(s)
21 U.S.C. § 963	Conspiracy to Import Five Kilograms or More of Cocaine	1
21 U.S.C. § 963	Attempt to Import Five Kilograms or More of Cocaine	2
18 U.S.C. § 1956(h)	Conspiracy to Launder Monetary Instruments	31,32
18 U.S.C. § 1956(a)(1) (B)(i)	Money Laundering	34-59

18 U.S.C. § 1957

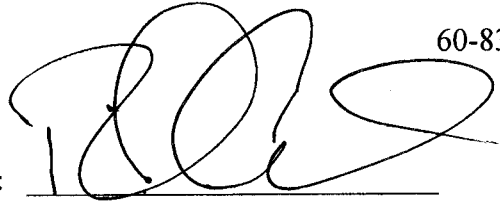
Money Laundering

60-83

Date

3/23/10

Signature of AUSA:



**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

Related Case Information

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No
Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number:
Search Warrant Case Number _____
R 20 from District of _____
Magistrate Case Number: _____

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Defendant Name

FNU LNU (6)

Alias Name

aka "El Mono"

Address

County in which offense was committed:

Dallas

2. U.S. Attorney Information

Rick A. Calvert

Bar # TX #03669700

3. Interpreter

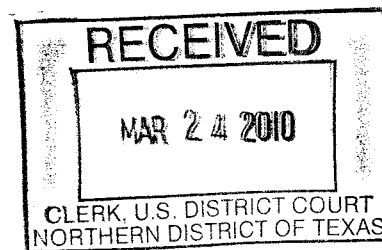
☒ Yes ☐ No

If Yes, list language and/or dialect: Spanish

4. Location Status

*** PLEASE ISSUE ARREST WARRANT***

- ☐ Already in Federal Custody
☐ Already in State Custody
☐ On Pretrial Release



5. U.S.C. Citations

Total # of Counts as to This Defendant: 28

☐ Petty

☐ Misdemeanor

☒ Felony

Citation

Description of Offense Charged

Count(s)

18 U.S.C. § 1956(h)

Conspiracy to Launder Monetary Instruments

3, 32

18 U.S.C. § 1956(a)(1)
(B)(i)

Money Laundering

4-16

18 U.S.C. § 1956(a)(2)
(B)(i)

Money Laundering

17

18 U.S.C. § 1957

Money Laundering

18-30

Date

3/23/10

Signature of AUSA:

SEALED

3:10-cr-00073-K

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

Related Case Information

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number:

Search Warrant Case Number _____

R 20 from District of _____

Magistrate Case Number: _____

Defendant Name

TITO MILLER PARRA-ISAZA (7)

Alias Name

aka "Miguel Angel", aka "Juan Pablo Leyba"

Address

County in which offense was committed:

Dallas

2. U.S. Attorney Information

Rick A. Calvert

Bar # TX #03669700

3. Interpreter

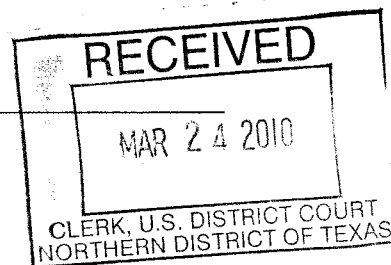
☒ Yes ☐ No

If Yes, list language and/or dialect: Spanish

4. Location Status

*** PLEASE ISSUE ARREST WARRANT***

- ☐ Already in Federal Custody
☐ Already in State Custody
☐ On Pretrial Release



5. U.S.C. Citations

Total # of Counts as to This Defendant: 28

☐ Petty

☐ Misdemeanor

☒ Felony

Citation

Description of Offense Charged

Count(s)

18 U.S.C. § 1956(h)

Conspiracy to Launder Monetary Instruments

3

18 U.S.C. § 1956(a)(1)
(B)(i)

Money Laundering

4-16

18 U.S.C. § 1956(a)(2)
(B)(i)

Money Laundering

17

18 U.S.C. § 1957

Money Laundering

18-30

Date

3/23/10

Signature of AUSA:

SEALED

3-10CR 073-K

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

Related Case Information

Superseding Indictment: ☐ Yes ☒ No New Defendant: ☒ Yes ☐ No

Pending CR Case in NDTX: ☐ Yes ☒ No If Yes, number: _____

Search Warrant Case Number _____

R 20 from District of _____

Magistrate Case Number: _____

1. Defendant Information

Juvenile: ☐ Yes ☒ No

If Yes, Matter to be sealed:

☒ Yes ☐ No

Defendant Name

JOAQUIN ALEJANDRO SENDEROS-HIGUERA (8)

Alias Name

Address

County in which offense was committed:

Dallas

2. U.S. Attorney Information

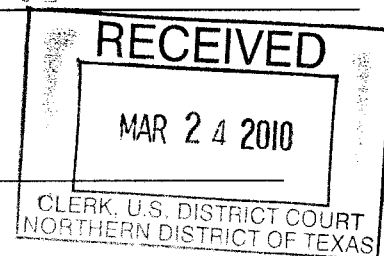
Rick A. Calvert

Bar # TX #03669700

3. Interpreter

☒ Yes ☐ No

If Yes, list language and/or dialect: Spanish



4. Location Status

*** PLEASE ISSUE ARREST WARRANT***

- ☐ Already in Federal Custody
☐ Already in State Custody
☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 28

☐ Petty

☐ Misdemeanor

☒ Felony

Citation	Description of Offense Charged	Count(s)
18 U.S.C. § 1956(h)	Conspiracy to Launder Monetary Instruments	3
18 U.S.C. § 1956(a)(1) (B)(i)	Money Laundering	4-16
18 U.S.C. § 1956(a)(2) (B)(i)	Money Laundering	17
18 U.S.C. § 1957	Money Laundering	18-30

Date

3/23/10

Signature of AUSA: